

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINAMichael J Dozier

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

Found Group International

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**Complaint for a Civil Case**

Case No. \_\_\_\_\_  
*(to be filled in by the Clerk's Office)*

Jury Trial: ☒ Yes ☐ No  
*(check one)*

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Michael J Dozier</u>
Street Address	<u>128 Fuzzy Dr</u>
City and County	<u>Georgetown</u>
State and Zip Code	<u>South Carolina 29440</u>
Telephone Number	<u>843-833-2202</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	<u>Foulders Group International</u>
Job or Title (if known)	<u></u>
Street Address	<u>8700 Golf Village</u>
City and County	<u>Myrtle Beach</u>
State and Zip Code	<u>South Carolina 29579</u>
Telephone Number	<u></u>

**Defendant No. 2**

Name	<u></u>
Job or Title (if known)	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>

**Defendant No. 3**

Name	<u></u>
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Job or Title \_\_\_\_\_  
 (if known)  
 Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_  
 Defendant No. 4  
 Name \_\_\_\_\_  
 Job or Title \_\_\_\_\_  
 (if known)  
 Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the State of *(name)* \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* \_\_\_\_\_, is a citizen of the State of *(name)* \_\_\_\_\_. Or is a citizen of *(foreign nation)* \_\_\_\_\_.

**b. If the defendant is a corporation**

The defendant, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_. Or is incorporated under the laws of *(foreign nation)* \_\_\_\_\_, and has its principal place of business in *(name)* \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

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**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Claims can be found in AFFIDAVIT

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**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Can be found in AFFIDAVIT

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**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 7-3-, 2025.

Signature of Plaintiff

Michael J Dozier

Printed Name of Plaintiff

Michael J Dozier

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

# AFFIDAVIT

I Michael Dozier (MICHAEL JERMAINE DOZIER)  
State that: FOUNDERS GROUP INTERNATIONAL  
Human Resource and Management Staff Subjugated  
I Michael Dozier (MICHAEL JERMAINE DOZIER)

To The Following: Breach of Contract, Discrimination,  
Unequal Employment Environment, Cronyism, Victimization -  
to White Privilege, White Supremacy, Abuse of Authority,  
Harassment, Work Place Hostility, Unfair Disciplinary Actions,  
Retaliation, Wrongful Termination

Under Penalty of Prejury, I hereby declare and affirm  
that the above-mentioned statement is, to the best of  
My Knowledge, True and Correct.

Michael J. Dozier

State of: South Carolina

County of: Georgetown

The foregoing instrument was acknowledged  
before me 20<sup>th</sup> day of Feb. 2025

Adriel Duncan  
Your Name Here, Notary Public

My Commission Expires 10/06/2034

ADRIEL DUNCAN  
Notary Public  
State of South Carolina  
My Commission Expires October 06, 2034



FOUNDERS GROUP INTERNATIONAL,  
Hereby Agree to pay I Michael Dozier  
(MICHAEL JERMAINE DOZIER)

\$10 million Dollars If Not Rebutted By 03/31/20  
(Monday March 31st of 2025)

(+7 million Dollars If False Affidavit Rebuttal  
is Presented)

\$ 5 million Dollars for Settlement of Claim  
and Lawsuit

Michael J Dozier

State of: South Carolina

County of: Georgetown

The foregoing instrument was acknowledged  
before me 26<sup>th</sup> day of Feb, 2025

Adriel Duncan  
Your Name Here, Notary Public

My Commission Expires 10/06/2034

ADRIEL DUNCAN  
Notary Public  
State of South Carolina  
My Commission Expires October 06, 2034

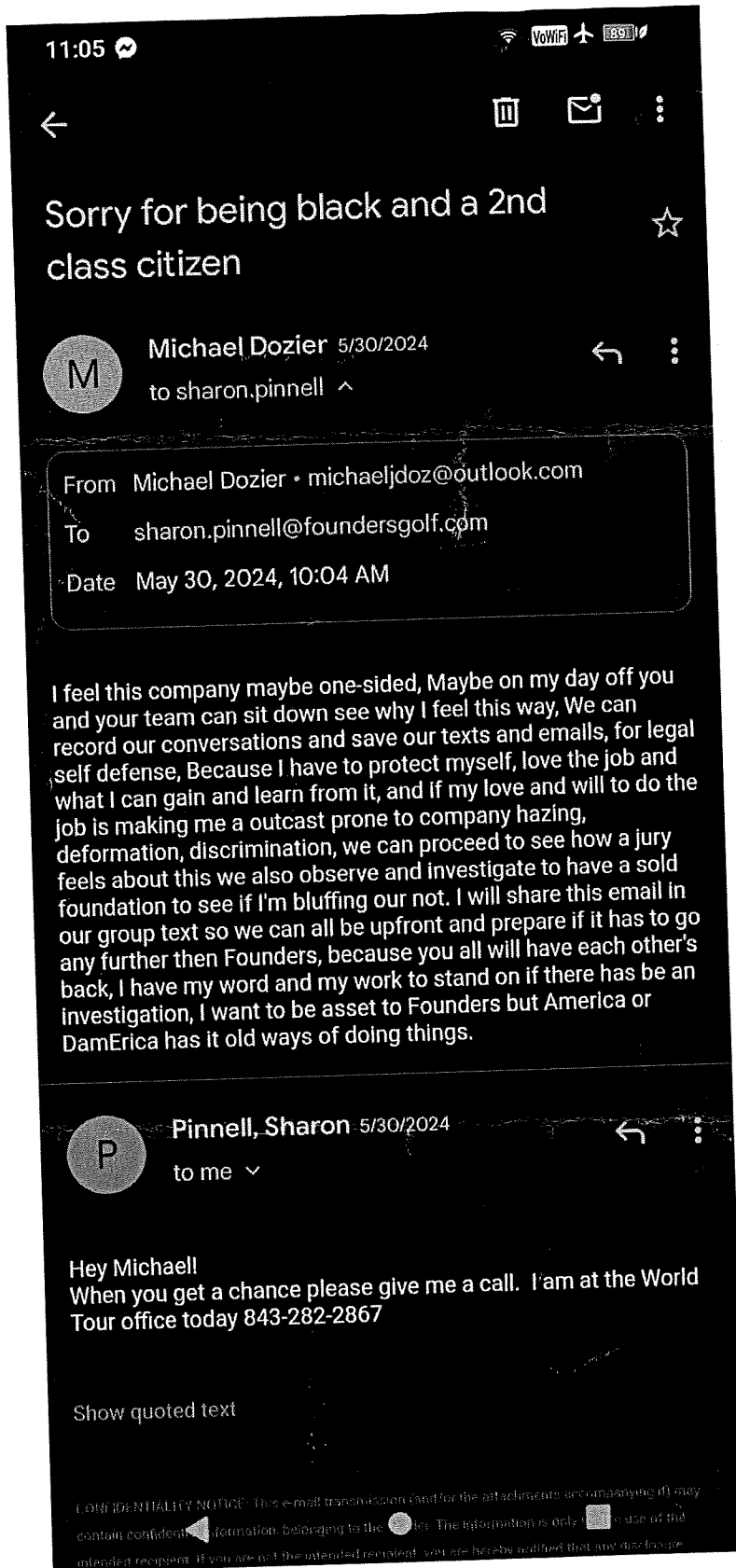


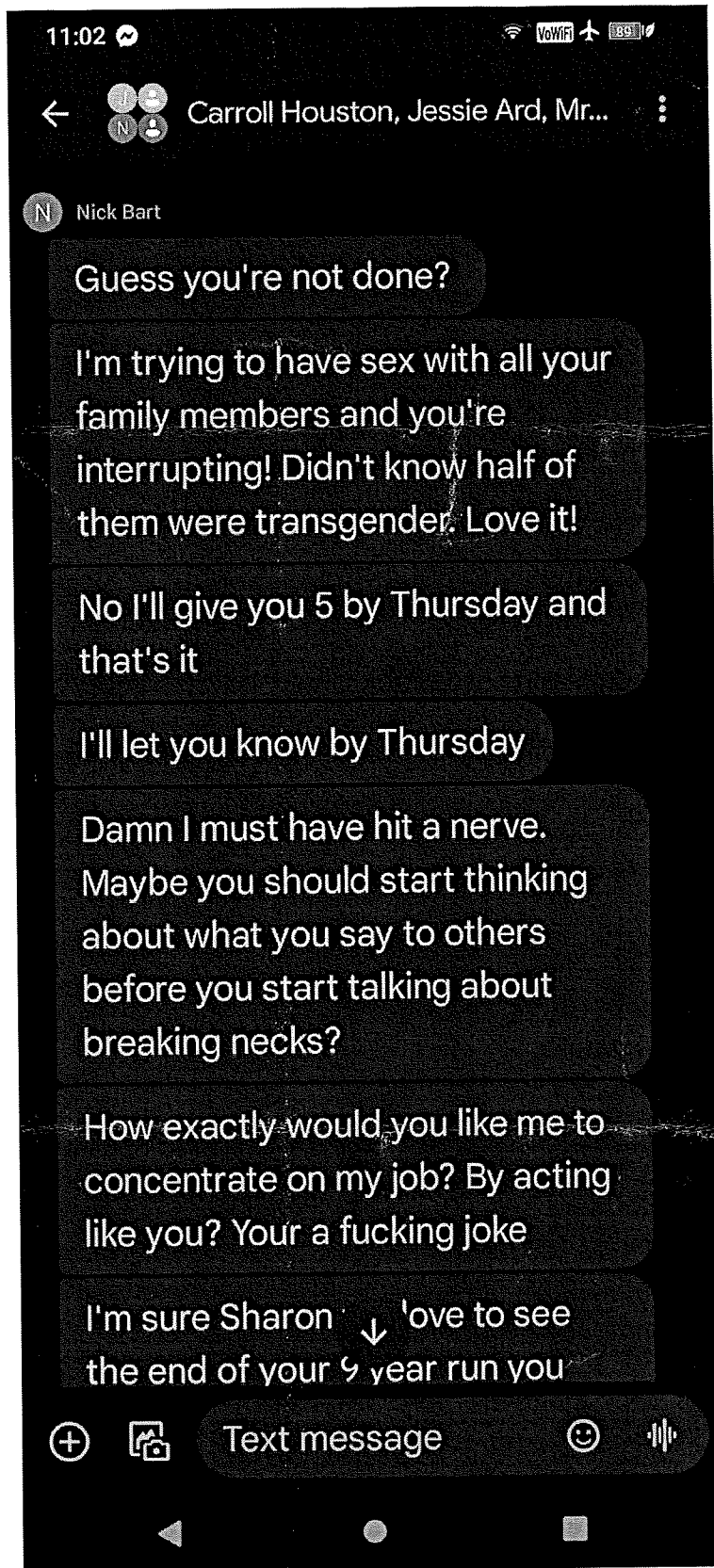
## Violation Of "42 U.S.C 1981"

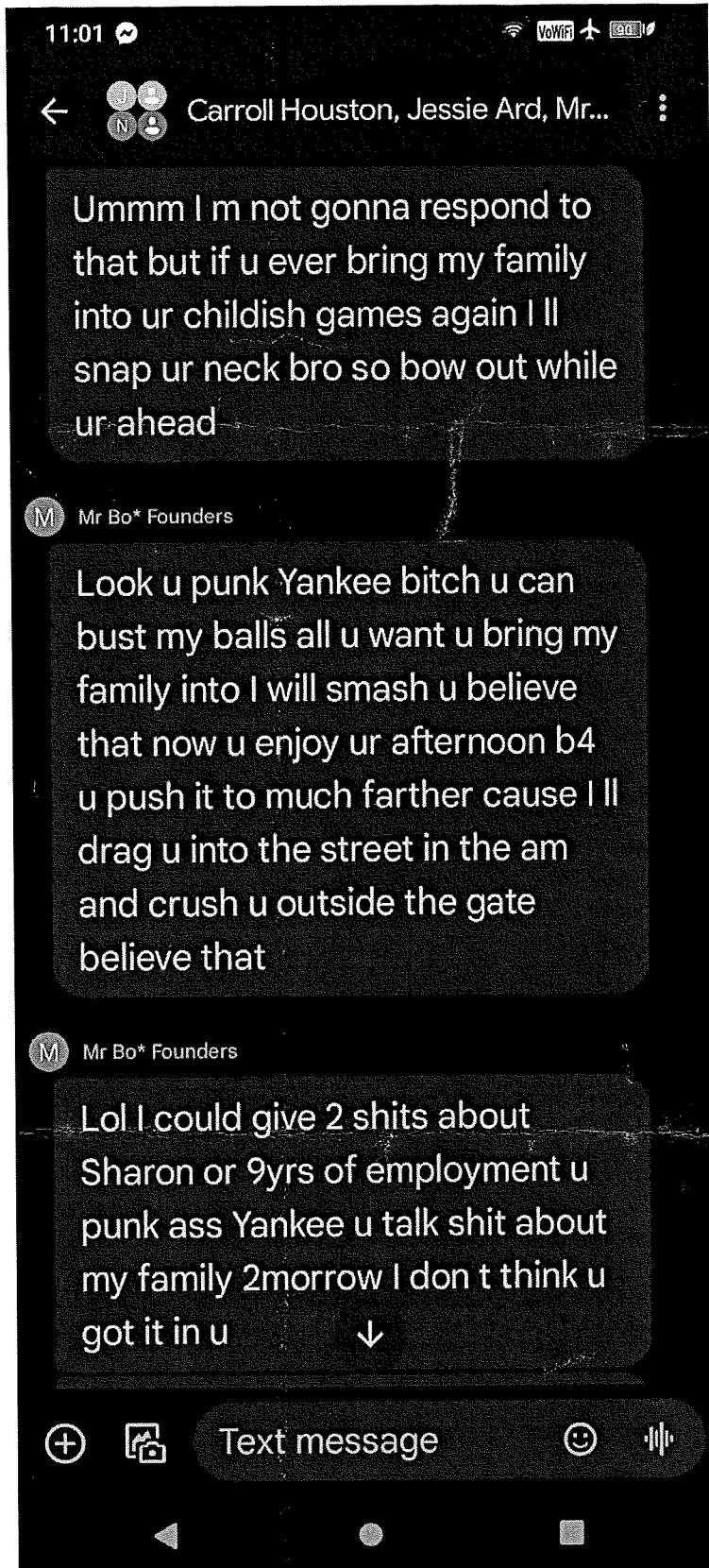
The printed out papers show a few of the retaliation and discrimination actions given by "Founders Group International", After acknowledging the environment of the workplace. It has I "Michael J Dozier"

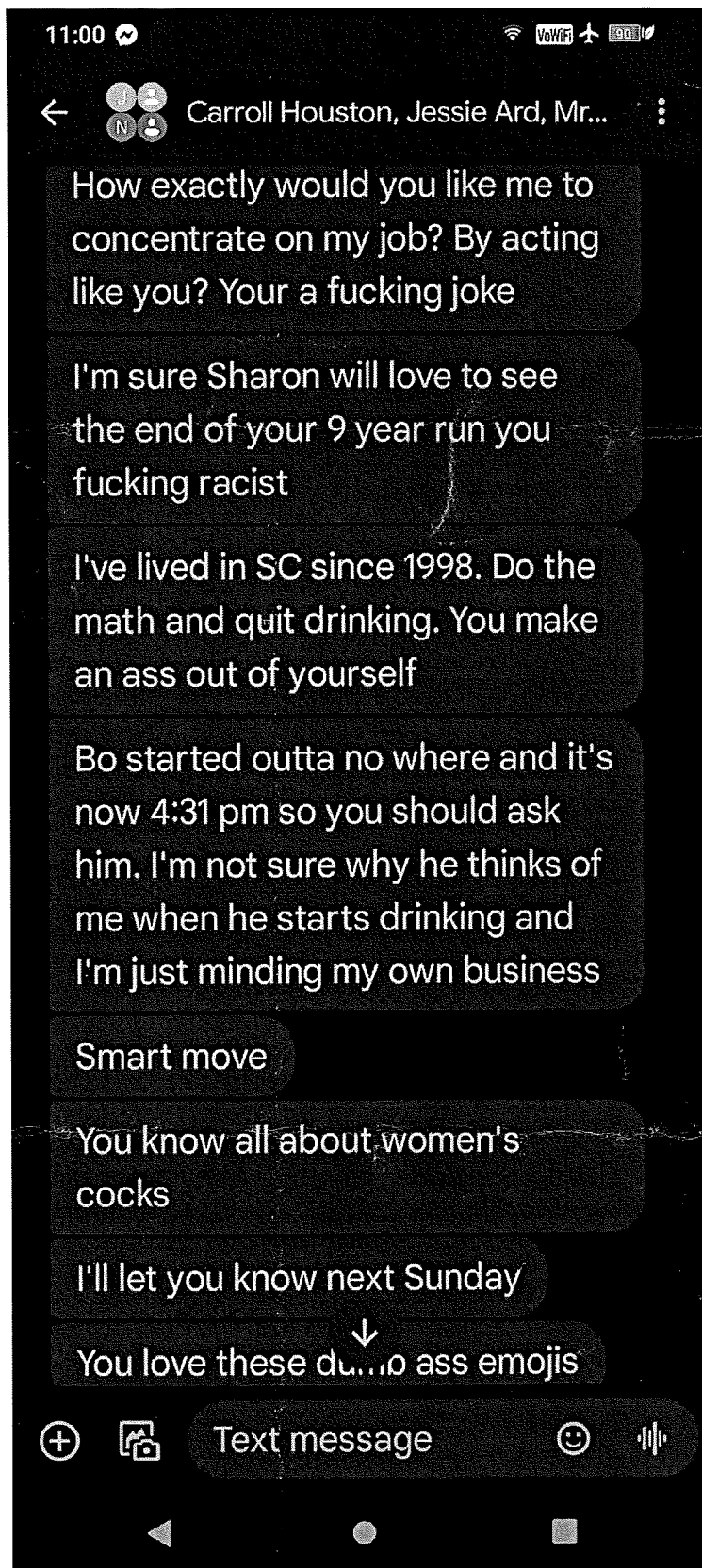
Email to Human Resource and threatening text messages sent in Work group chat between two Employees who are not Colored or African American. Along with my reply statement to "Founders Group International" False Deposition Statement. I know a jury trial with other hard working people will see that "42 U.S.C 1981" was violated by "Founders Group International".

Sincerely, Michael J Dozier









**From:** Michael Dozier <[michaeljdoz@outlook.com](mailto:michaeljdoz@outlook.com)>

**Sent:** Tuesday, March 25, 2025 9:09 AM

**To:** Kim Weaver <[kim.weaver@foundersgolf.com](mailto:kim.weaver@foundersgolf.com)>; Max Morgan <[max.morgan@foundersgolf.com](mailto:max.morgan@foundersgolf.com)>; [info@FoundersGolf.com](mailto:info@FoundersGolf.com) <[info@FoundersGolf.com](mailto:info@FoundersGolf.com)>; [kslater@schac.sc.gov](mailto:kslater@schac.sc.gov) <[kslater@schac.sc.gov](mailto:kslater@schac.sc.gov)>

**Subject:** Re: Information

Good morning Ms Weaver, I would like to have your statement on why I was terminated and your reasons for terminating me?

As we all know one of Founders Group International Superintendents, After a disagreement he said he was leaving y'all can find someone else, Waited in his truck that he utilized to block the Gate we Enter and Exit, to intimidate me, got out of his truck as I approach the Exit, He was blocking and asked a few questions on what I said and gave his response "That heres an Opportunity to handle our Situation" While with his truck parked blocking the exit and Him inches from my face, He kept his hands Moving around his pockets, me thinking he probably had a gun, yelled out he's trying to attack me, as he kept trying to invoke a physical altercation as I was just trying to go home.

Ms Weaver you said I threaten someone, So I would like to know what was the threat I was proclaim to have made, and to whom, and how did they feel threaten. I think we should prepare for Court, The EEOC Title VII I feel like it will benefit companies and businesses more then hard working employees there little payout is something businesses and companies save for a raining day, you didn't only over look my Civil rights but also my Human Rights!

On Mar 24, 2025 11:36 AM, Michael Dozier <[michaeljdoz@outlook.com](mailto:michaeljdoz@outlook.com)> wrote:

Good morning Ms Weaver, If you don't mind may I have your statement on the reason why I was fired again?



January 6, 2025

Page 2

FGI to FGI's Human Resources Department on or around May 30, 2024, which FGI fully and thoroughly investigated. The investigation revealed no evidence Mr. Dozier was mistreated or subjected to discrimination.<sup>1</sup>

Conversely, during the investigation, FGI discovered that Mr. Dozier's own behavior was combative, as Mr. Dozier's superiors and/or co-workers reported that he was abrasive, threatened them, and they were fearful and/or uncomfortable working with him. FGI thus provided Mr. Dozier with an opportunity to improve his behavior and establish better relationships with co-workers by allowing him to transfer from one golf course to another under the same terms of employment. Unfortunately, Mr. Dozier's combative behavior only worsened after transfer.

Mr. Dozier was ultimately discharged from employment by FGI for violation of FGI's policies and inappropriate workplace behavior, including, without limitation, using racial slurs and making threats of violence against FGI employees.

## I. BACKGROUND

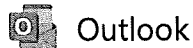
### 1. FGI's Employment Policies and Procedures

FGI maintains an Employee Handbook, which sets forth FGI's written policies and procedures and is distributed to all employees upon hiring.<sup>2</sup> Within such written policies and procedures, FGI makes clear that it is an equal opportunity employer and that all employees are entitled to equal employment regardless of race and/or other protected characteristics as required by local, state, and federal law. (Exhibit 2 – Handbook, p. 4). FGI is committed to providing a work environment that is free of discrimination and its Equal Opportunity Policy applies to all terms and conditions of employment. (*Id.*).

FGI is likewise committed to diversity, equity, and inclusion in its workplace, and maintains a policy that encourages its employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make its employees unique. (*Id.* at pp. 4-5). FGI's Diversity, Equity, and Inclusion Policy enforces **respectful communication and cooperation between all employees**, emphasizes the **importance of teamwork**, and clearly states that **any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action**. (*Id.* at p. 5).

FGI maintains a Workplace Violence Prevention Policy, which prohibits employees from behaving in a threatening or violent manner and states “[t]hreats, threatening language, or any





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**~Digital Affidavit~**

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From Michaeljdoz@outlook.com <michaeljdoz@outlook.com>

Date Thu 4/10/2025 7:00 AM

To kslater@schac.sc.gov <kslater@schac.sc.gov>

Cc DGarren@bellamylaw.com <DGarren@bellamylaw.com>; BBaroody@bellamylaw.com  
<BBaroody@bellamylaw.com>; HLusk@bellamylaw.com <HLusk@bellamylaw.com>

As we all know one of Founders Group International Superintendents, After a disagreement he said he was leaving y'all can find someone else, Waited in his truck that he utilized to block the Gate we Enter and Exit, to intimidate me, got out of his truck as I approach the Exit, He was blocking and asked a few questions on what I said and gave his response "That heres an Opportunity to handle our Situation" While with his truck parked blocking the exit and Him inches from my face, He kept his hands Moving around his pockets, me thinking he probably had a gun, yelled out he's trying to attack me, as he kept trying to invoke a physical altercation as I was just trying to go home.

**The Statement above Is about I "Michael Dozier" and "Mr Thompkins"**

The situation took place after a "Group Meeting" at the end of which "Mr Houston" asked "If there's anything anybody needs to say or address". So I said yes " I don't like the way Mr Mitch (Mr Thompkins) treats Me, He "Mr Thompkins" respond "How do I treat you, What don't you like", My response was "You let your Authority behind these gates get to your head, It's more than just McDonalds outside the gate, There's legal ways to handle this in the real world Attorneys, Lawyers, and Legal Agencies", After My response "Mr Houston" asked us to talk about it in his office. Once we were in, they asked Me too "Close the Door for privacy", I told them "No I would like for the Guys to Hear Me Also", Then I being to explain and express things I told them before! Minutes into it Mr Thompkins "Got Upset" said "He was leaving you all can find somebody else etc" and other things as He Stormed out of the Office and around the Meeting/garage area before he approach the Door and left to go home or wherever.

**Mr Joseph and The Golfers**

As I was "Training Myself" to Mow Collars and Approaches, There where no signs of golfers behind me at the moment, As I came around the Greens Collar I seen "Mr Joseph" coming from the direction of golfers who Just Approached, He stopped when he seen I saw him, Got off his mower and Yelled, as " I was turning off my blades" "AYE GET THE HELL OUT THE WAY, BRING YOUR ASS OVER HERE!", He told me that the Golfers said "They ran into Me a couple of courses back", Then He said " Maybe I should put it up if I don't know what I'm doing, I thought you were Trained Already!", I told him I was in the process of being trained and If I'm not doing it right then Fucking Teach Me, If I'm not doing it right then just Show Me The Correct Way, Instead of Just Throwing Me on Equipment and Telling Me To Do That and This!" Then He said "I'm not Fucking Teaching You Nothing, I Thought You where already

trained, I'm Not Teaching You Nothing talking to me like that!", Then I said as He left "You all cant get mad If I'm Learning and Teaching Myself", Then after the golfers left I proceeded to start again.

### **I "Michael Dozier" and Mr Kelly**

After Lunch and a brief Meeting, "Where Mr Kenny Giles gave a few Statements on picking up The Work Ethic, Being Behind on Tasks, And Workers that He felt was Slacking Off, And How he was going to be expecting More from Then on"

As the Meeting ended I told Dustin and Mr Ernst That "I would Meet them at Hole 14 or The Next Bunker", They Replied "Ok"

As I was finishing Edging The Bunker, I noticed them parked chilling talking looking at the bunker, Moments later I saw Jon Jon pulling up and then start conversing with them, As I was finishing up Jon Jon was now at The Top of The Bunker looking down at Me, As I finished they all started to Hula Ho, I gathered the equipment I brought out and then started to put them on My cart, As I did so Jon Jon complained about how I was "Working to Hard and Moving to Fast" and "Not Working With The Team", I replied "I'm Working With The Team I just Edged and Weed eat The Bunker and It only Needs to be Hula Ho'd and it's Three of You and one of Me"

Mr Ernst who should be 68 this year, Who I also gave a ride to when he lost his keys Said "Take it Easy Take Your Time Your Working to Much" ( I was told multiple times I don't get paid Salary I get Paid By The Hour), I told Him "Yes Sir I'm just going to finish The Next Bunker Since We got 30mins Before We Go"

After Jon Jon heard that he got more irritated, and Started Raising his voice, Complaining on how I'm trying to Out Work him, Trying to look better then The Team, And how I need to Slow Down!

I asked Him "who is He talking to and who is He yelling At!"

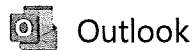
He replied "You Nigga!"

I Responded "Come on Man Like we don't Know Each other, You know Where I live, We don't have to be Yelling Loud and Acting Childish, We supposed to be Men and not little boys, If We want to yell like little children we can do that up at The Quality Inn, So We Won't put our Jobs at Risk, Since we can't talk like Men!"

Then I proceeded to Go(While He"Jon Jon" was still Yelling with Himself) to The Next Bunker until it was Time to Clock out.

**I understand this statement is made for use as evidence in court and is subject to penalty for perjury,I declare that, to the best of my knowledge and belief, the information herein is true and complete**

**Sincerely, Michael J Dozier**



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(No subject)

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From Michael Dozier <michaeljdoz@outlook.com>

Date Thu 7/3/2025 8:13 AM

To Michael Dozier <michaeljdoz@outlook.com>

**The Statement Made By "Founders Group International" regarding May 30th, 24, Meeting/Investigation, Is False "Libel & Defamation of Character".**

Conversely during the "Investigation" "FGI" discovered that Mr Dozier's own Behavior was Combative, as Mr Dozier's "Superiors" and/or Co-workers "Reported" that he was Abrasive, "Threatened them", and "They" were "Fearful and/or Uncomfortable" Working With Him.

### How Does This Show Racism?

May 30th 2024

Was the day I Emailed and Texted Them as a Group "Sorry For Being Black and A 2nd Class Citizen" to have on record things that was previously express and growing tensions, Which I Have Voice Recorded Conversation of the Meeting that Day,

Between I"Michael Dozier" Ms Kim Weaver, Mr Max Morgan, Ms Sharon Pinnell, Where they Praised My Hard work and Team effort and how The other Co-workers only had Great Things to Say.

And it Shows How "Founders Group International" Overlooked My Human & Civil Rights by Stating They Did Investigation On or Around 5/30/24, And May 30th, 24 is the Day I sent The Email "Sorry For Being Black and A 2nd Class Citizen", Action speaks louder than Words, But that was a Quick Investigation Maybe The Reason for **False Statement** Gave By "Founders Group International".

2nd it shows Racism Because the Whole Statement is False, Which leaves Me feeling Emotionally Distressed and like a Throw Away Slave!

"Founders Group International" stated that My Transfer was based on a "Behavior Improvement" bases That Is Also False, And was told for Better Environment because of Expression and Claims of Treatment and Discrimination.

How come All The Positive Statements of and on My Character and Work changed After The Email and Meeting with I "Michael Dozier" Expressing Claims of Discrimination.

After Making Recorded Claims of Discrimination "Founders Group International" Staff Actions, Thoughts and Views on I"Michael Dozier" Changed I went from Being a On time Always there Hard working Employee,

Conversely during the "Investigation" "FGI" discovered that Mr Dozier's own Behavior was Combative, as Mr Dozier's "Superiors" and/or

Co-workers "Reported" that He was Abrasive, "Threatened Them", and "They" were "Fearful and/or Uncomfortable" Working With Him.

**The Statement Made Against I"Michael Dozier" From "Founders Group International" Is False and is Libel and Defamation of Character, Voice Recording Will Prove The Statement Made To Be False.**

**The Statement Is Not only Defamation, but Retaliation, Breach of Contract(Human/Civil Rights), Harassment, Discrimination.**

- **Defamation is a false statement that harms a person's reputation. It includes both libel (written) and slander (spoken). The core principle is that defamation damages someone's reputation by spreading false information.**
- **Breach of Contract occurs when one or more parties fail to fulfill their obligations as outlined in a legally binding agreement. This can include failing to deliver promised goods, services, or payments, or not performing within the agreed-upon time frame or standards.**
- **Harassment is a form of discrimination. It happens when someone experiences unwanted offensive or humiliating comments or behavior. There must be a link between the harassing behavior and that person's protected personal characteristics called prohibited grounds.**
- **Workplace Retaliation occurs when an employer takes Adverse Actions against an employee for engaging in Protected Activities.**
- **Protected activities can include "Reporting Discrimination" or Harassment, participating in investigations, or "Opposing Discriminatory Practices".**
- **Discrimination refers to the Unfair or prejudicial treatment of Individuals or Groups based on characteristics like race, gender, age, religion, or sexual orientation. It involves making distinctions between people that are not Justified and lead to Unequal Treatment.**

**I understand this statement is made for use as evidence in court and is subject to penalty for perjury,I declare that, to the best of my knowledge and belief, the information herein is true and complete**

**Sincerely, Michael J Dozier**

**Respondeat Superior:**

**This legal principle, meaning "let the superior answer," holds an employer responsible for the actions of their employees when those actions occur within the scope of employment. This**

means if a manager, as an employee, acts in a way that causes harm or violates the law while working for the company, the employer can be held liable.

**Vicarious Liability:**

This concept extends the principle of employer responsibility to include situations where an employer is held accountable for the acts of their employees, even if they didn't directly participate in or authorize the actions. It's particularly relevant in cases of harassment or discrimination where a supervisor's actions create a hostile work environment.

Employers, can be held accountable for the actions of their chief managers, especially when those actions fall within the scope of employment or violate legal standards. This accountability can arise through the legal doctrine of respondeat superior or vicarious liability, where an employer is responsible for the wrongful acts of its employees.